

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION**

ESCORT INC.,

Plaintiff,

v.

UNIDEN AMERICA CORPORATION,

Defendant.

Civil Action No. 3:18-cv-00161-N

JOINT STATUS REPORT AND PROPOSED SCHEDULE

Per the Court's May 23, 2019 Order (ECF 62), Escort Inc. ("Escort") and Uniden America Corporation ("Uniden") (collectively "the Parties") hereby submit the following report and proposed schedule.

A. The Parties believe this matter will be ready for trial by June 1, 2020 and estimate that the trial of this matter will take five trial days.

B. The Parties previously mediated this matter unsuccessfully. The Parties are amenable to additional ADR and have agreed on a December 20, 2019 deadline to complete an additional mediation in this matter.

C. The Parties respectfully submit the following proposed schedule for the remainder of this matter.

Deadline	Event
December 13, 2019	Deadline for close of fact discovery
December 20, 2019	Deadline to complete second mediation
January 13, 2020	Opening expert reports by the party with the burden of proof
February 17, 2020	Rebuttal expert reports

March 6, 2020	Deadline to complete expert discovery
March 13, 2020	Deadline to file dispositive motions and motions to strike expert testimony, including <i>Daubert</i> motions
April 3, 2020	Serve Pretrial Disclosures (Witness List, Deposition Designations, and Exhibit List)
April 10, 2020	Serve Objections to Pretrial Disclosures and Rebuttal Pretrial Disclosures
April 17, 2020	Serve Objections to Rebuttal Pretrial Disclosures
May 1, 2020	File Motions <i>in Limine</i>
June 1, 2020	File Joint Pretrial Order complying with LR 16.4
Any time after June 14, 2020	Trial

Dated: June 25, 2019

Respectfully submitted,

/s/ Timothy E. Grochocinski

Edward R. Nelson III (TX No. 00797142)
ed@nbafirm.com
NELSON BUMGARDNER ALBRITTON PC
3131 W. 7th Street, Suite 300
Fort Worth, Texas 76107
P. 817-377-9111

Timothy E. Grochocinski (IL No. 6295055)

tim@nbafirm.com

Joseph P. Oldaker (IL No. 6295319)

joseph@nbafirm.com

NELSON BUMGARDNER ALBRITTON PC
15020 S. Ravinia Ave., Suite 29
Orland Park, Illinois 60462
P. 708-675-1974

*COUNSEL FOR PLAINTIFF
ESCORT INC.*

/s/ David B. Conrad

Neil J. McNabney (TX No. 24002583)

mcnabney@fr.com

David B. Conrad (TX No. 24049042)

conrad@fr.com

Theresa M. Dawson (TX No. 24065128)

tdawson@fr.com

FISH & RICHARDSON P.C.

1717 Main Street, Suite 5000

Dallas, Texas 75201

P. 214-747-5070

*COUNSEL FOR DEFENDANT
UNIDEN AMERICA CORP.*

CERTIFICATE OF SERVICE

I certify that a copy of the foregoing was served on counsel for all parties of record on June 25, 2019 via the Court's CM/ECF system.

/s/ Timothy E. Grochocinski